

EXHIBIT 16



AMERICAN
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INTERNATIONAL CENTRE
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Neil Currie
Vice President
2355 Highway 36 W.
Suite 400
Roseville, MN 55113
Telephone: (612)332-6545
Fax: (612)342-2334

November 14, 2022

Jonathan Gardner
Labaton Sucharow LLP
140 Broadway
New York, NY 10005
Via Email to: jgardner@labaton.com

Randall W. Edwards, Esq.
O'Melveny & Myers, LLP
2 Embarcadero Center
28th Floor
San Francisco, CA 94411-3823
Via Email to: redwards@omm.com

Case Number: 01-22-0003-9924

Individual Claimants

-vs-

Samsung Electronics USA, Inc.

Dear Parties:

The American Arbitration Association (AAA) is in receipt of a letter dated November 8, 2022 from Mr. Edwards in which he advises that Samsung Electronics America, Inc. and Samsung Electronics Co., Ltd. (Samsung) declines to submit their portion of the filings fees on the 50,000 Individual Claimants that met the AAA's filing requirements, except for cases filed by California claimants. Per our review of matters filed by the claimants, we believe there are 14 cases filed by California claimants. As such, Samsung owes filing fees in the amount of \$4,200. The AAA's letter of October 31, 2022 stated that it shall serve as the invoice pursuant to California Code of Civil Procedure Sections 1281.97 and 1281.98. A revised invoice is enclosed to facilitate payment by Samsung, however this revised invoice does not change the payment due date. As these arbitrations are subject to California Code of Civil Procedure sections 1281.97 and 1281.98, payment from Samsung must be received by November 30, 2022 or the AAA may close these cases. Pursuant to California Code of Civil Procedure 1281.97 the AAA cannot grant any extensions to this payment deadline.

As for the remaining non-California cases, the AAA notes that per Mr. Gardner's September 28, 2022 letter, the claimants decline paying Samsung's portion of the filing fees so that the matters may proceed. Based on the claimants' and Samsung's statements declining to pay Samsung's portion of the filing fees for the non-California cases, unless we hear otherwise prior to November 16, 2022, the AAA will close all non-California cases. R-1(d) of the Consumer Arbitration Rules (Consumer Rules), provides, "should the AAA decline to administer an arbitration, either party may choose to submit its dispute to the appropriate court for resolution."

Further, as set forth in Consumer Arbitration Rules, Costs of Arbitration, AAA Administration Fees, section (i), "in the event any multiple case filings are closed due to non-payment of filing fees by the business, the AAA will return any filing fees received from the individuals." The consumers' portion of the filing fees for the 14 California cases is

\$1400. A refund of \$2,532,600 representing filing fees for 49,986 non-California cases will be issued to the claimants.

Sincerely,

/s/

Victoria Chandler

Director of ADR Operations

Direct Dial: (612)278-5124

Email: VictoriaChandler@adr.org

Fax: (612)342-2334

cc: Shannon Tully
Melissa H. Nafash
Eric Ormsby, Esq.
Ashley Pavel
Matthew Powers, Esq.